

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICHAEL MULGREW, *et al.*,

Plaintiffs,

- against -

UNITED STATES DEPARTMENT OF
TRANSPORTATION, *et al.*,

Defendants.

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: Civil Case No. 1:24-cv-01644-LJL

: [rel. 1:24-cv-00367-LJL]

: [rel. 1:23-cv-10365-LJL]

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PLAINTIFFS' NOTICE OF CROSS-MOTION TO AMEND COMPLAINT

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 7.1 and Federal Rule of Civil Procedure 15(a)(2), Plaintiffs will move before the Honorable Lewis J. Liman, Judge of the U.S. District Court for the Southern District of New York for leave to amend their Complaint (ECF 19) and file a Second Amended Complaint to substitute Defendant New York State Department of Transportation ("NYSDOT") with Stephanie Winkelhake in her official capacity.

In support of its Motion, Plaintiffs rely on the accompanying Memorandum of Law, the Declaration of Alan M. Klinger, and supporting exhibits.

Dated: April 5, 2024
New York, New York

STEPTOE LLP

By:

/s/ Alan M. Klinger

Alan M. Klinger

Dina Kolker

David Kahne

1114 Avenue of the Americas

New York, New York 10036

(212) 506-3900

aklinger@steptoe.com

Co-Counsel for Plaintiffs